

WheelPower

Privacy Policy

Introduction

WheelPower promises to take great care with your personal data, and we commit to protecting any personal information we obtain about you, whether you are a financial supporter, apply for a job, volunteer or participate in one of our sports events or programmes.

This Privacy Policy sets out how and why we obtain, use and protect personal information if you interact with us in one of these roles.

Who we are

The British Wheelchair Sports Foundation Ltd, operating as WheelPower is a registered charity in England and Wales (charity number 265498). We are also a company limited by guarantee (company number 01059490).

WheelPower's registered address is Stoke Mandeville Stadium, Guttman Road, Stoke Mandeville, Buckinghamshire, HP21 9PP.

This Privacy Policy relates to information which is obtained by WheelPower and for which WheelPower is the Data Controller.

WheelPower's purpose

Sport and physical activity can be truly transformational in the lives of disabled children and adults. We provide, promote and develop opportunities for disabled people to participate in recreational and competitive wheelchair sport to lead healthy, active lives.

Our supporters help us to achieve this in a variety of ways, primarily by:

- Fundraising and donating money to support our work
- Volunteering at events and in our offices

We take active steps to make sure that our supporters are aware of the ways in which they can help us achieve our overall purpose.

Why we hold and process supporters' personal data

We hold and process supporters' personal data for a number of reasons:

- To keep a record of donations made and actions taken by our supporters and our communications with them
- To send our supporters marketing information about our events, programmes, fundraising activities and appeals where we have their consent or are otherwise allowed to
- To support volunteers, whether at events or participating in fundraising events
- To support community based fundraising and campaigning
- To claim gift aid on donations
- To fulfil contractual obligations entered into with supporters e.g. online event entries

- To keep people safe, whether they are visitors to our office, staff or participants in events
- To comply with legal obligations
- To manage our organisation
- To ensure we do not send unwanted information to supporters or members of the public who have informed us they do not wish to be contacted

These reasons are underpinned by a "legal basis" under GDPR.

Explaining the legal bases we rely on

The law on data protection sets out a number of different reasons for organisations to collect and process your personal data: When collecting your personal data, we will always make clear to you which data is necessary for a particular purpose.

WheelPower relies on the following legal bases in our marketing activities:

Consent

Wherever possible, we will ask for your consent to send you marketing information. We will do this through a clear statement of what you will receive and allow you to select only those channels that you wish to hear from us by.

For example, if you donate online, you will be asked whether you would like us to keep in touch about our projects, fundraising activities and appeals. You will also be asked which channel(s) of communication you would like us to use (with a choice of email, SMS, post and telephone being offered).

Legitimate interest

In specific situations, we process your data to pursue our legitimate interests in ways which might reasonably be expected and which do not materially impact your rights, freedom or interests.

WheelPower's use of legitimate interest includes the following:

- Sending direct marketing information by post, to keep our supporters updated on WheelPower's projects, fundraising activities and appeals. We will only do this where we have reason to believe that this information will be of interest. We make it easy for you to opt out, see How to control what we send you or request we update your personal information.
- If you have opted in to WheelPower's emails or text messages we may use your details to link to your account on Facebook or other social media site in order to serve you WheelPower content.
- We analyse your previous support of WheelPower in order to offer relevant ways of supporting us in the future.
- To help identify businesses who may wish to support WheelPower, we send emails to individuals where relevant to their job, for instance people working in Corporate Social Responsibility.

For activities other than marketing, we may rely on different legal bases:

Legal compliance

If the law requires us to, we may need to collect and process your data.

For example, where you sign up to the Gift Aid scheme, we will process your data for the purposes of submitting a Gift Aid claim to HMRC.

Consent

We may ask for your consent for data.

For example, where you engage with a sports programme and can give you a clear choice about what information you need to provide.

Legitimate Interest

In many situations we need data in order to carry out a task.

For example, if you enter a fundraising event.

Public Interest

In limited situations we may use data in the public interest. It is likely to be in the public interest to collect data to prevent crime or dishonesty, ensure that we are fair in our practices by carrying out equality and diversity monitoring, or safeguard the wellbeing of people with whom we work.

When and why we will send you personalised marketing communications

WheelPower will only contact you for marketing purposes - for example keep you up to date on our work, or let you know of ways in which you can support that work - where we have your consent or we are otherwise allowed to do so (see **Other circumstances in which you may receive marketing information**).

We will make it easy for you to tell us if you would like to receive marketing communications from us and hear more about our work and the ways in which you would like to receive this information (post, email, SMS and phone). We will not send you marketing material if you tell us that you do not wish to receive it. There are a variety of ways you can do this, see **How to control** what we send you or request we update your personal information.

Where you give us your consent to send marketing information, we will wherever possible let you know how long this consent will last. Unless we have grounds for believing that a longer period is reasonable and have explained this to you, we will understand your consent to last for 36 months. After this time, in order for us to continue to update you, we will need your refreshed consent. You can update or withdraw your consent at any time, for individual channels of communication, or for all channels. See **How to control** what we send you or request we update your personal information for details on how to do this.

Consent lasting more than 36 months

We will generally treat any marketing consent you give us as lasting for 36 months, but will apply the following exceptions (but only where we inform you of this at the time you give consent):

- Where you have committed to giving us a regular donation. In this situation, and unless you withdraw your consent, we will treat consent as enduring until you cancel your donation, at which point your consent will expire 36 months after the last donation. This is to enable us to keep you up to date with the impact of your gifts, and to ask whether alternative means of support would be of interest.
- Where you have notified us that you will be leaving a legacy to WheelPower. This is a lifetime commitment and although we will provide you with regular opportunities to shape and control your communication from WheelPower we will treat your consent as ongoing.

Other circumstances in which you may receive marketing information

"Legitimate Interest"

We may send you marketing communications by direct mail where you are a regular supporter and we have evidence that you do not object to receiving marketing material through the post.

We will not use "legitimate interest" if you have opted out of direct mail whether direct to WheelPower or by registering with the Mailing Preference Service (MPS) or the Fundraising Preference Service (FPS).

"Soft opt in"

This allows organisations to send marketing communications by email and SMS to individuals who have previously purchased similar goods and services, provided they were given the opportunity to opt out at the time of purchase. In WheelPower's case, this allows us to send marketing emails and SMS to people who have made a financial transaction with WheelPower by entering events or making a purchase from WheelPower's website. We apply a 36-month time limit, and only communicate on this basis where you have made a transaction within this period. We will not use the "soft opt in" option if you have opted out of receiving email and/or SMS, whether direct to WheelPower or via the Fundraising Preference Service.

How and when we collect information about you

WheelPower may collect your personal data in the following circumstances:

When you give it to us DIRECTLY

You may give us your personal data directly when you make a donation, sign up for one of our events, volunteer at one of our events, purchase products from WheelPower or when you communicate with us.

When you give it to us INDIRECTLY

You may give us your information indirectly when you sign up to events such as the London Marathon, contribute to WheelPower via fundraising sites like JustGiving or Virgin Money Giving. These independent third parties will pass your data to WheelPower where you have indicated that you wish to support WheelPower and have given your consent or it is a necessary part of completing a contract with you.

Sometimes your personal data is collected by an organisation working on our behalf (for example a professional fundraising agency) but as they are acting on our behalf we are the "data controller" and responsible for the security and proper processing of that data.

When you access WheelPower's Social Media

We might also obtain your personal data through your use of social media such as Facebook, WhatsApp, Twitter, Instagram or LinkedIn, depending on your settings or the privacy policies of these social media and messaging services. To change your settings on these services, please refer to their privacy notices, which will tell you how to do this.

<https://www.facebook.com/policy.php>

<https://twitter.com/en/privacy>

<https://www.whatsapp.com/legal/#privacy-policy>

<https://help.instagram.com/519522125107875>

<https://www.linkedin.com/legal/privacy-policy>

When the information is publicly available

We might also obtain personal data about individuals who may be interested in giving major gifts to charities or organisations like WheelPower. In this scenario, WheelPower may seek to find out more about these individuals, their interests and motivations for giving through publicly available information. This information may include newspaper or other media coverage, open postings on social media sites such as LinkedIn and data from Companies House. WheelPower will not retain publicly available data relating to major donors without their consent, which will be sought at the earliest practical opportunity. Where we decide not to make contact, we will delete all personal data obtained, other than basic contact details, to which we will apply a suppression flag to ensure we do not make contact in the future.

We may also gather information if your activities relate to our work - for instance, if you are a public figure such as a Member of Parliament or you represent an organisation which we work with we may gather information about you in order to make decisions - for instance, whether we engage with you to seek your support for our work.

WheelPower's use of cookies

Cookies are used to enable us to improve services for you through, for example measuring how many people are using each page of the website and for how long so that we can try to improve the quality of our website.

When you visit our web site we will collect data from your computer or other device such as a smart phone or tablet through the use of "cookies". Cookies are created by your web browser when you visit our website. Every time you go back to the WheelPower website, your browser will send the cookie file back to the website's server. They improve your experience of using our website, for example, by remembering your preference settings so that you are presented with information likely to be most relevant to you, and by measuring your use of the website to enable us to continuously improve our website to ensure that it meets your needs. Cookies can also be used to show you relevant WheelPower content on social media services such as Facebook - these are known as "retargeting" or "advertising" cookies.

If you wish to restrict or block the cookies which are set by the WheelPower website, or indeed any other website, you can do this through your browser settings. The Help function within your browser should tell you how.

Alternatively, you may wish to visit www.aboutcookies.org which contains comprehensive information on how to do this on a wide variety of browsers. You will also find details on how to delete cookies from your computer as well as more general information about cookies. For information on how to do this on the browser of your mobile phone you will need to refer to your handset manual.

If you visit our website as an anonymous visitor (e.g. you switch off cookies), WheelPower may still collect certain information from your browser, such as the IP address (an IP address is a number that can uniquely identify a computer or other internet device).

The WheelPower website contains hyperlinks to websites owned and operated by other organisations. These include our member sports (such as British Wheelchair Basketball), national governing bodies for sport (such as British Canoeing), sports bodies (such as ParalympicsGB), media organisations (such as the BBC), our corporate partners (such as Coloplast) and other related charities (such as Whizz-Kidz). These third party websites have their own privacy policies, including policies on their use of cookies, and we urge you to review them. They will govern the use of personal information you submit or which is collected by cookies whilst visiting these websites. We cannot accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

Please be aware that restricting cookies may impact on the functionality of the WheelPower website.

Google Analytics

WheelPower uses Google Analytics, a web analytics service provided by Google, Inc. Google Analytics sets a cookie in order to evaluate your use of the website and compile reports for us on activity on the site.

Google stores the information collected by the cookie on servers in the United States of America. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using the WheelPower website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

What information might WheelPower collect about you?

We only collect personal data relevant to the type of transactions or interaction you have with WheelPower.

Whatever your interaction with us this information will be minimal and linked to the purpose for which we need it.

For example, when you contact WheelPower to make a donation, purchase an item online, enter an event or sign up to WheelPower's online content (such as newsletters) or you telephone, email, write to or text WheelPower, or engage with WheelPower via social media channels, we may receive and retain personal information.

In these cases we are likely to process details such as your name, email address, postal address, telephone or mobile number, bank account details to process donations and whether or not you are a tax payer so that we can claim Gift Aid.

If you participate in an event we may (with your permission) take your photograph or video, or interview you.

If you participate in market research, we may ask you questions regarding your experience with us, or other survey questions relating to your experience.

If you are a volunteer, we may collect information such as correspondence with you, the events you attend, details of your background or how we would like to work with you.

Where we gather information about you which is publicly available - for instance as a major donor - this may include your name, contact details, views and interests.

Sensitive Personal Data

We only collect "sensitive personal data" about our supporters, e.g. health status, where there is a clear and specific reason for doing so, such as participation in a marathon, volunteering at an event or participating in a WheelPower sport event.

We collect this data where we need it to ensure that we provide appropriate facilities or support to enable you to participate in the event or carry out your role. Clear notices will be provided on application forms so that it is clear what information we need and why we need it.

If you apply for a role with us, we may collect this data for equality monitoring.

Rarely, we may collect this data for the prevention of crime or dishonesty, to safeguard those with whom we work, or for another reason which is in the public interest. Where we do this we will do it carefully and in accordance with applicable laws.

Should you support WheelPower in a substantial way, we may provide an account manager to help you tailor your relationship to suit your interests. If this is the case we may collect sensitive personal data where relevant to our relationship, such as your political or religious views. Should you disclose information to us about your health or your family, this may also be recorded, so that we can communicate with you in a considerate and appropriate manner.

All sensitive personal data is stored on a secure database, to which only a limited number of relevant staff have access. It is deleted when no longer relevant, is never shared with third parties, and is available to you at any point should you wish to see it.

How will WheelPower use your personal data?

WheelPower will use your personal information for the following purposes:

For administrative reasons, including:

- "service administration", which means that WheelPower may contact you for reasons related to administering any donations you have made, your tax status with regard to Gift Aid if claimed, the completion of commercial or other transactions you have entered into with WheelPower or the activity or online content you have signed up for;
- to confirm receipt of donations (unless you have asked us not to do this), and to say thank you and provide details of how your donation might be used, for example if you donate via text you will receive a "bounce back" text message;
- in relation to correspondence you have entered into with us whether by letter, email, text, social media, message board or any other means, and to contact you about any content you provide;
- for internal record keeping so as to keep a record of your relationship with us;
- to fulfil sales contracts you have entered into with WheelPower, such as entering the Tour de Vale Bike Ride;
- to provide logistical and fundraising information to people who are taking part in a fundraising event in aid of WheelPower, such as the Tour de Vale Bike Ride or the London Marathon;
- to communicate with WheelPower volunteers - to support you in your designated role or administer that role and our organisation;
- to keep your data up to date - for instance we may use the Royal Mail's data on postal address changes to ensure that we can maintain contact with you where we believe you are happy to be contacted by post, we may also use services which notify us of the recently deceased to avoid any distress that continued communications would cause;
- to implement any instructions you give us to with regard to withdrawing consent to send marketing information or informing us through the Fundraising Preference Service that you do not wish to receive any marketing information;
- to use IP addresses to identify the location of users, to block disruptive use and to establish the number of visits from different countries;
- to protect our staff and those with whom we work, or to prevent crime and dishonesty.

For marketing and fundraising reasons (see When and why we will send you personalised marketing communications).

For market research

- to invite you to participate in surveys or research about WheelPower or our work;
- to analyse and improve the activities and content offered by the WheelPower website to provide you with the most user-friendly navigation experience. We may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes.

Job applicants

If you apply to work at WheelPower we will only use the information you give us to process your application or to monitor recruitment statistics on an unidentified basis. If we want to disclose information to someone outside WheelPower, for example, if we need a reference from your previous employer, we will tell you beforehand. The only exception is where the law obliges us to disclose information to a third party (such as the police) and we are not allowed to tell you.

If you are unsuccessful in your job application, we may hold your personal information after we've finished recruiting for the post you applied for, for up to 12 months to deal with any follow up queries or issues.

We keep statistical information about all applicants to develop our recruitment processes however no individual applicant would be identifiable from this information.

If you commence employment with the WheelPower, your personal information will be processed in accordance with your employment contract and other applicable human resources policies we have from time to time.

Will WheelPower share your personal information with anyone else?

We will only use your information within WheelPower for the purposes for which it was obtained. WheelPower will not, under any circumstances, share or sell your personal data with any third party for their own marketing purposes, and you will not receive marketing from any other companies, charities or other organisations as a result of giving your details to us.

WheelPower's suppliers

We may need to share your information with service providers who help us to deliver our events, fundraising activities and appeals, for instance to time riders taking part in the Tour de Vale Bike Ride. These "data processors" will only act under our instruction and are subject to pre-contract scrutiny and contractual obligations containing strict data protection clauses. We do not allow these organisations to use your data for their own purposes or disclose it to other third parties without our consent and we will take all reasonable care to ensure that they keep your data secure.

Facebook and other social media sites

We may also use your email address and phone number to match to your account on Facebook or other social media sites in order to show you WheelPower content while using these services. We

only do this where you have opted in to marketing emails or phone calls and we keep your data secure by encrypting it. No data we hold about you is retained by the third party.

In addition, we may also use your email address and phone number to link to Facebook or other social media sites in order to identify other users of these sites whom we believe would be interested in WheelPower, and we may then show them WheelPower content. No data we hold about you is retained by the third party.

There are two ways to prevent this use of your data, you can either update your preferences at WheelPower by opting out of the relevant channel of communication or you can do this via the social media site:

Facebook: <https://www.facebook.com/help/568137493302217>

LinkedIn: <https://www.linkedin.com/help/linkedin/answer/62931>

Twitter: <https://business.twitter.com/en/help/troubleshooting/how-twitter-ads-work.html>

Updating your preferences with WheelPower will not guarantee that you never see WheelPower content on social media, since the social media site may select you based on other criteria and without your data having been provided by WheelPower.

Current and former WheelPower employees

When you leave WheelPower, WheelPower may process your data to respond to requests for employment references.

Where legally required

We will also comply with legal requests where disclosure is required or permitted by law (for example to government bodies, statutory bodies, or law enforcement agencies for tax purposes, where it is in the public interest, or the prevention and detection of crime, subject to appropriate protection in law).

On some occasions, we may have to use services that host your information outside of the UK. When this occurs, we will only ever use highly reputable suppliers that have gone through information security due diligence, have contractual clauses about the high standard of data processing, and meet all requirements that your information is looked after to a standard as if it were in the UK.

How long will WheelPower keep your personal information?

We will hold your personal information on our systems for as long as is necessary for the relevant activity, for example we will keep a record of donations subject to gift aid for at least seven years to comply with HMRC rules.

If you request that we stop sending you marketing materials we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

Legacy income is vital to the running of the charity. We may keep data you provide to us indefinitely, to carry out legacy administration and communicate effectively with the families of people leaving us legacies. This also enables us to identify and analyse the source of legacy income we receive.

Where you contribute material to us, such as sharing your story in a case study, we will only keep your content for as long as is reasonably required for the purpose(s) for which it was submitted unless otherwise stated at the point of generation.

How to control what we send you or request we update your personal information?

The accuracy of your information is really important to us. We want to ensure that we are able to communicate with you in ways that you are happy with, and to provide you with information that is of interest.

If you wish to change how we communicate with you, or update the information we hold, then please contact us:

email us at info@wheelpower.org.uk

write to us at WheelPower, Guttman Road, Stoke Mandeville, HP21 9PP

call us on 01296 395995 (Mon-Fri 9am-5pm)

Additionally you can opt out of email separately:

Email: You can opt out of marketing emails at any time by clicking the unsubscribe link in any marketing email from WheelPower.

How long will it take for these changes to be effective?

We endeavour to meet the following service levels where supporters request we do not send them marketing information:

Email: 48 hours from receipt of email

Telephone: 48 hours from receipt of request to opt out

Mail: 28 days from receipt of 'do not mail' request. This period is longer than for other channels due to the production times for mailing campaigns, and in most cases we would expect the change to be effective much more quickly.

Should you request we stop marketing to you by completing the contact us page on our website, it may take up to 14 days to complete your request due to the manual nature of this process.

How WheelPower keeps your data safe

We ensure that there are appropriate technical controls in place to protect your personal details. For example our network is protected and routinely monitored.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.

Where we use external companies to collect or process personal data on our behalf, we undertake comprehensive checks on these companies before we work with them, and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they collect on our behalf, or have access to.

These organisations - referred to as "Data Processors" also have legal liability for the way in which your data is used, providing you with additional protection.

Your rights over your personal data

You have a variety of rights in respect of your data, including the rights to see, update, restrict, object to the use of or withdraw use of your data. In particular, depending upon why we hold your data, you may have the right to request:

- Access to the personal data we hold about you, including how we first obtained your details, free of charge in most cases (this is known as a 'Subject Access Request').
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we delete your personal data from our systems (this is known as the "Right to be Forgotten").
- That we no longer process your data automatically to decide whether particular marketing activities are likely to be of interest, or suggest an appropriate donation level based on your previous donation history. This is known as profiling, and helps us to ensure that our marketing is relevant and appropriate.

You can contact us to request to exercise these rights at any time, see [How to control what we send you](#) or request we update your personal information for details of how to get in touch.

Opting out of Direct marketing

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We will always comply with your request.

Where we are sending you direct marketing on the basis of our legitimate interest, you can also ask us to stop. In the case of postal marketing sent on this basis, we will always comply with your request to opt out. Similarly, where we send email marketing on a soft opt in basis (see [How and when we collect information about you](#)), we will also comply with all requests to opt out.

Right to be Forgotten

Upon request we will delete your personal data from our systems, to the extent that we are permitted to by law or regulatory guidelines. For instance under HMRC rules we are required to retain financial data for 7 years for audit purposes, and so will not be able to delete donation details until this time period has elapsed.

Subject Access Requests

You have the right to request a copy of the personal information we hold about you. We will provide this as soon as possible, and within a month unless there are specific reasons why this would not be possible. We will always let you know if this is likely to be the case.

Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

How to find out more, or make a complaint

If you would like more information, to update your details or have any questions about this policy, please email at info@wheelpower.org.uk or write to us at: WheelPower, Stoke Mandeville Stadium, Guttman Road, Stoke Mandeville, Buckinghamshire, HP21 9PP or call us on 01296 395995 (Mon-Fri 9am-5pm).

To make a formal complaint about WheelPower's approach to data protection or raise privacy concerns directly with our senior management team, please contact:

Chief Executive
WheelPower
Stoke Mandeville Stadium
Guttman Road
Stoke Mandeville
Buckinghamshire
HP21 9PP
Email: info@wheelpower.org.uk

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling 0303 123 1113.

Or go online to www.ico.org.uk/concerns (opens in a new window; please note we can't be responsible for the content of external websites).